

November 28, 2005

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12 Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 05-196; Compliance Letter

Dear Ms. Dortch:

Global Crossing Local Services, Inc. ("GCLS") submits this Compliance Letter in conformity with the requirements of the Commission in its *VOIP E911 Order (IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers*, WC Dkt. 05-196, First Report and Order, 20 FCC Rcd 10245 (2005)); *see* 47 C.F.R. § 9.5(f), and as set forth by the Enforcement Bureau in its *Public Notice*, DA 05-2945, released November 7, 2005.

GCLS is in the process of providing an IP-Enabled Service, as defined by the Commission in 47 C.F.R. § 9.3, to prospective end-user customers. To date, GCLS does not have any end-user subscribers to its IP-Enabled Services. In this Compliance Letter, GCLS sets forth its plans and procedures for ensuring compliance with the Commission's VOIP E911 requirements *before* it commences providing IP-Enabled Services to its end-user customers.

A. 911 Solution

GLCS is able to provide E911 services in compliance with the Commission's requirements as follows:

> **MICHAEL J. SHORTLEY, III**
VICE PRESIDENT & GENERAL COUNSEL
NORTH AMERICA

GLOBAL CROSSING TELECOMMUNICATIONS, INC.
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TEL 585.255.1429
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WWW.GLOBALCROSSING.COM

1. GCLS is capable of routing all 911 calls in the areas in which it provides IP-Enabled services to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing Selective Routers, the trunk lines between the Selective Router and the PSAP and other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized. GCLS is interconnected with Selective Routers in the localities set forth on Exhibit A. GCLS only offers its IP-Enabled Service in those areas.

2. GCLS is in full compliance with the Commission's *VOIP E911 Order* in those areas of the country in which it provides its IP-Enabled services.

B. Transmission of ANI and Registered Location Information

GCLS is capable of transmitting the ANI and registered location of its IP-Enabled service customers to all answering points that are capable of receiving and processing such information in those areas of the country where it provides an IP-Enabled service.

As noted above, GCLS does not currently have any IP-Enabled service customers; however, as set forth below, it has procedures in place to obtain the customers' registered location information and changes thereto.

C. Process for Obtaining Initial Registered Location Information

When a customer subscribes to GCLS' IP-Enabled service, GCLS obtains the customer's initial registered location information as a part of the service order process. GCLS confirms that it has received this information prior to provisioning service to a customer.

D. Process for Obtaining Updated Registered Location Information

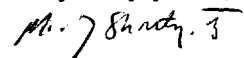
As a part of the sales order process, customers are required to commit to updating their registered location information as required. Customers may do so either through a web-based interface that customers use for other information (such as ordering, provisioning and billing information) or by dialing, utilizing their VOIP equipment, a GCLS customer service number to update this information. Global Crossing will then load the customer's new registered location into its switches and systems. This process may take up to three days to complete.

E. Technical Requirements for Nomadic Subscribers

GCLS is in the process of evaluating technical solutions for those of its customers that may be nomadic subscribers. It is currently reviewing the submissions by AT&T, MCI and Verizon on this subject.

If there are any questions or concerns regarding the foregoing, please do not hesitate to contact the undersigned.

Very truly yours,



cc: Kathy Berthot, Deputy Chief, Spectrum Enforcement
Division (kathy.berthot@fcc.gov)

Janice Myles, Competition Policy Division
(janice.myles@fcc.gov)

Best Copy and Printing (fcc@pcpiweb.com)

EXHIBIT A

Selective Router	County/PSAP
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KENTOH671ED	PORTAGE CO.
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KENTOH671ED	MAHONING CO.
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KENTOH671ED	SUMMIT CO.
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KENTOH671ED	STARK EOC
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Selective Router	County/PSAP
ALBYNYSS1ED	ALBANY CO.
GLVVNYXA1ED	MONTGOMERY CO.
ALBYNYSS1ED	SARATOGA CO.
ALBYNYSS1ED	GREENE CO.
ALBYNYSS1ED	SCHENECTADY CO.
overflows to	
SCHNNYSC1ED	
ALBYNYSS1ED	RENSSELAER CO.
ALBYNYSS1ED	WARREN CO.
ALBYNYSS1ED	WASHINGTON CO.
ALBYNYSS1ED	COLUMBIA CO.

Selective Router	County/PSAP
HLWDCA01CT9	Los Angeles County
HLWDCA01CT9	Los Angeles County
HLWDCA01CT9	Los Angeles County
SNGBCA01CT9	Los Angeles County
SNGBCA01CT9	San Gabriel Co. Sheriff
SHOKCA01CT9	Los Angeles County
SNANCA12CT9	Orange County Sheriff
SNANCA12CT9	Orange County Sheriff
RILTCA11CT9	Riverside County Sheriff
RILTCA11CT9	San Bernardino Co. Sheriff

Selective Router	County/PSAP
WLANCAXH1ED	LA County
WMNSCAXF1ED	Orange County
LAPNCAXG1ED	LA County
BRSWCAXH1ED	San Bernardino
WMNSCAXF1ED	Orange County
LNBHCAXG1ED	LA County
WMNSCAXF1ED	Orange County
WLANCAXH1ED	LA County
LNBHCAXG1ED	LA County

Selective Router	County/PSAP
ATLNGAPP12T	FULTON County
overflow to	
ATLNGAFP12T	
ATLNGAPP12T	GWINETTE COUNTY
overflow to	(DeKalb, Fulton, Gwinette,
ATLNGAFP12T	Walton Counties)
ATLNGAPP12T	COBB COUNTY
overflow to	(Cherokee, Cobb, Douglas,
ATLNGAFP12T	Paulding Counties)
ATLNGAPP12T	CLAYTON COUNTY
overflow to	(Clayton, Fayette, Fulton
ATLNGAFP12T	Henry, Spaulding Counties)
ATLNGAPP12T	Rockdale County
overflow to	
ATLNGAFP12T	

Selective Router	County/PSAP
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PIVLMDPK12T	CITY OF BALTIMORE
overflow to	
ELCYMDEL12T	

ELCYMDEL12T	ANNE ARUNDEL CO.
overflow to	
PIVLMDPK12T	

ELCYMDEL12T	BALTIMORE CO.
overflow to	
PIVLMDPK12T	

ELCYMDEL12T	CARROLL CO.
overflow to	
PIVLMDPK12T	

ELCYMDEL12T	HARFORD CO.
overflow to	
PIVLMDPK12T	

ELCYMDEL12T	HOWARD CO.
overflow to	
PIVLMDPK12T	

Selective Router	County/PSAP
ORNDCA11CT9	Alameda County
ORNDCA11CT9	Alameda County
ORNDCA11CT9	Contra Costa County
VLLJCA01CT9	Solano County
MLVYCA01CT9	Marin County
MLBRCA11CT9	San Francisco County
MLBRCA11CT9	San Mateo County
SNTCCA11CT9	Santa Clara County
SNTCCA11CT9	Santa Clara County
SNTCCA11CT9	Santa Clara County
SNTCCA11CT9	Santa Clara County
SNTCCA11CT9	Santa Clara County
SNTCCA11CT9	Santa Clara County
SNTCCA11CT9	Santa Clara County

Selective Router	County/PSAP
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WKFDMA BE1ED	Wakefield
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MEFDMA PL1ED	Medfield
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WSBOMASU1ED	Westboro
overflow to	
NATNMAMA1ED	

Selective Router	County/PSAP
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BFLONYFR1ED	Erie Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Niagara Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Wyoming Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Genesee Co.
overflow to	
LNCSNYLC1ED	

Selective Router	County/PSAP
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WKFDMA BE1ED	Wakefield
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MEFDMA PL1ED	Medfield
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WSBOMASU1ED	Westboro
overflow to	
NATNMAMA1ED	

Selective Router	County/PSAP
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BFLONYFR1ED	Erie Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Niagara Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Wyoming Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Genesee Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Orleans Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Cattaraugus Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Orleans Co.
overflow to	
LNCSNYLC1ED	

BFLONYFR1ED	Cattaraugus Co.
overflow to	
LNCSNYLC1ED	

Selective Router	County/PSAP
CHRLNCCA34G	MECKLENBURG CO.
CHRLNCLP35F	CABARRU CO.
CHRLNCLP35F	IREDELL CO.
CHRLNCLP35F	ROWAN CO.
CHRLNCUN59F	STANLY CO.
CHRLNCUN59F	GASTON CO.
CHRLNCUN59F	LINCOLN CO.
UNINSCMA42E	YORK CO.
RTTNNCCE28G	CLEVELAND CO.
RTTNNCCE28G	GASTON CO.

Selective Router	County/PSAP
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CHCGILSTDS0	CITY OF CHICAGO
overflow to	
CHCGILLADS0	

BLISILBIDS0	COOK CO.
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EGVGILEGDS0	COOK CO.
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LBRDILLMDS0	DUPAGE CO.
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LBRDILLMDS0	COOK CO.
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Selective Router	County/PSAP
CNCNOHWSDS3	Hamilton County, OH
CNCNOHWSDS3	Butler County, OH
CNCNOHWSDS3	Clermont County, OH
CNCNOHWSDS3	Boone County, KY
CNCNOHWSDS3	Campbell County, KY
CNCNOHWSDS3	Kenton County, KY

Selective Router	County/PSAP
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CLEVOH64DC0	Cuyahoga County
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CLEVOH64DC0	Cuyahoga County
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CLEVOH64DC0	Lake County
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Selective Router	County/PSAP
CLMBOH231ED	MADISON COUNTY
CLMBOH231ED	FAIRFIELD COUNTY
CLMBOH231ED	MADISON COUNTY
CLMBOH231ED	FRANKLIN COUNTY

Selective Router	County/PSAP
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NWBRCT0091T	HARTFORD P.D.
overflow to	
NRWLCT0291T	

NRWLCT0291T	NEW HAVEN ECC
overflow to	
NWBRCT0091T	

Selective Router	County/PSAP
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DLLSTXRI3ED	Dallas Neutral
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DLLSTXRI3ED	Tarrant Co.
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Selective Router	County/PSAP
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DNTNTXXA1ED	Denton County
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DNTNTXXA1ED	Collin County
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Selective Router	County/PSAP
DNVRCOCH2GT	Jefferson County
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Aurora Police
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Adams County
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Denver Police
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Arapahoe County
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Clear Creek County
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Boulder Regional Comm Ctr
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Douglas County
overflow to	
BRFDCOMA1GT	
DNVRCOCH2GT	Elbert County
overflow to	
BRFDCOMA1GT	

DNVRCOCH2GT	Gilpin County
overflow to	
BRFDCOMA1GT	

DNVRCOCH2GT	Weld County
overflow to	
BRFDCOMA1GT	

Selective Router	County/PSAP
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ROCHMIMNDS0	Oakland County
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ANARMIMNDS0	City of Detroit P.D.
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ANARMIMNDS0	City of Canton P.D.
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ANARMIMNDS0	Brownstown P.D.
ANARMIMNDS0	Westland P.D.
ANARMIMNDS0	Livonia P.D.
ANARMIMNDS0	Monroe County Sheriff
ANARMIMNDS0	Taylor P.D.
ANARMIMNDS0	Washtenaw County P.D.
ROCHMIMNDS0	Genesee County P.D.
ROCHMIMNDS0	Macomb County Sheriff
ROCHMIMNDS0	City of Brighton MSP

Selective Router	County/PSAP
FTLDFLMRDS0	Broward County
MIAMFLBCDS0	Miami-Dade County
WPBHFLLEDS0	Palm Beach County
WPBHFLLEDS0	Martin County

Selective Router	County/PSAP
FTWOTXED1ED	Tarrant County
FTWOTXED1ED	Parker Co.Sheriff
FTWOTXED1ED	Springtown P.D.

Selective Router	County/PSAP
APPLWI010ED	Outagamie County
APPLWI010ED	Brown County
APPLWI010ED	Winnebago County

Selective Router	County/PSAP
HSTNTXMC1ED	Harris County City of Houston
HSTNTXMC1ED	Harris County Harris County Neutral
HSTNTXMC1ED	Harris County Friendswood P.D.
HSTNTXMC1ED	Harris County LaPorte P.D.
HSTNTXMC1ED	Harris County Deer Park P.D.
HSTNTXMC1ED	Brazoria County Brazoria Sheriff
HSTNTXMC1ED	Montgomery County Montgomery Sheriff

Selective Router	County/PSAP
KOKMIN01DS0	Boone County
KOKMIN01DS0	Hamilton County
KOKMIN01DS0	Hancock County
KOKMIN01DS0	Hendricks County
KOKMIN01DS0	Marion County
KOKMIN01DS0	Morgan County
KOKMIN01DS0	Shelby County
KOKMIN01DS0	Johnson County

Selective Router	County/PSAP
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KSCYKSJO07T	KANSAS CITY P.D.
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KSCYKSJO07T	OVERLAND PARK P.D.
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Selective Router	County/PSAP
MILWWI480ED	Milwaukee County
MILWWI480ED	Waukesha County
MILWWI480ED	Racine County
MILWWI480ED	Ozaukee County
MILWWI480ED	Washington County
MILWWI480ED	Kenosha County

Selective Router	County/PSAP
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MIAMFLBCDS0	Miami-Dade County
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Selective Router	County/PSAP
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MPLSMNDT2ED	Anoka County Sheriff
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Carver County Sheriff
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Dakota County Sheriff
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Hennepin Co. Sheriff's Radio
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Ramsey County Sheriff
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Scott County Sheriff
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Washington County Sheriff
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	Minneapolis ECC
overflow to	
STPLMNMK1ED	

MPLSMNDT2ED	St. Paul Police Department
overflow to	Ramsey County
STPLMNMK1ED	

MPLSMNDT2ED	Chisago County Sheriff
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MPLSMNDT2ED	Isanti County Sheriff
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MPLSMNDT2ED	Sherburne County Sheriff
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MPLSMNDT2ED	Wright County Sheriff
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Selective Router	County/PSAP
NSVLTNSTDS0	Cheatam County
NSVLTNSTDS0	Maury County
NSVLTNSTDS0	Robertson County
NSVLTNSTDS0	Rutherford County
NSVLTNSTDS0	Williamson County
NSVLTNSTDS0	Sumner County
NSVLTNSTDS0	Davidson County
NSVLTNSTDS0	Dickson County
NSVLTNSTDS0	Wilson County
NSVLTNSTDS0	Giles County
NSVLTNSTDS0	Marshall County

Selective Router	County/PSAP
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NBWKNJNB3ED	Bergen County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Essex County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Hudson County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Middlesex County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Monmouth County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Morris County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Ocean County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Passiac County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Somerset County
overflow to	

MDSNNJMA1ED	
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NBWKNJNB3ED	Union County
overflow to	
MDSNNJMA1ED	

NBWKNJNB3ED	Warren County
overflow to	
MDSNNJMA1ED	

Selective Router	County/PSAP
NYCKNYBRDS0	BRIDGE STREET
NYCMNY13DS0	2nd AVE
GRCYNYGC1ED	SUFFOLK COUNTY
PCHGNYPH1ED	PATCHOGUE
FLPKNYFP1ED	NASSAU COUNTY
WHPLNYWPIED	WESTCHESTER COUNTY
overflow to	
NYACNYNK1ED	
WHPLNYWPIED	PUTNAM COUNTY
overflow to	
NYACNYNK1ED	
CHESNYXA1ED	ORANGE COUNTY
PLVWNYPV1ED	NASSAU COUNTY
NYACNYNK1ED	ROCKLAND COUNTY
overflow to	
WHPLNYWPIED	
NRWLCT0291T	New Haven ECC
overflow to	
NWBRCT0091T	

Selective Router	County/PSAP
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HTBOPAHBDS0	Montgomery County
overflow to	
PXVLPAPVDS0	

PAOLPAPADS0	Delaware County
overflow to	
PXVLPAPVDS0	

PAOLPAPADS0	Chester County
overflow to	
PXVLPAPVDS0	

PHLAPAMKDS0	Philadelphia County
overflow to	
PHLAPALODS1	

HTBOPAHBDS0	Bucks County
overflow to	
ALTWPAALDS0	

RDNGPAREDS0	Berks County
overflow to	
PXVLPAPVDS0	

Selective Router	County/PSAP
PHNXAZSEDS0	MARICOPA CO.
PHNXAZSEDS0	MARICOPA CO.
PHNXAZSEDS0	MARICOPA CO.
PHNXAZSEDS0	CASA GRANDE P.D. City of Casa Grande
PHNXAZSEDS0	PINAL CO. Rural Pinal County

Selective Router	County/PSAP
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BRDDPABRDS0	Beaver County
overflow to	
BLLVPABEDS0	

BRDDPABRDS0	Fayette County
overflow to	
BLLVPABEDS0	

BRDDPABRDS0	Westmoreland
overflow to	
BLLVPABEDS0	

BRDDPABRDS0	Lawrence County
overflow to	
BLLVPABEDS0	

BRDDPABRDS0	Washington County
overflow to	
BLLVPABEDS0	

PITBPALFW01	Allegheny County
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PITBPALFW01	City of Pittsburgh
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Selective Router	County/PSAP
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PTLDOR691ED	MULTNOMAH CO.
overflow to	
PTLDOR121ED	

PTLDOR691ED	CLACKAMUS CO.
overflow to	
PTLDOR121ED	

PTLDOR691ED	MARION/POLK CO.
overflow to	
PTLDOR121ED	

BVTNORXB2ED	YAMHILL CO.
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BVTNORXB2ED	WASHINGTON CO.
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PTLDOR691ED	CLARK CO.
overflow to	
PTLDOR121ED	

PTLDOR691ED	COWLITZ CO.
overflow to	
PTLDOR121ED	

Selective Router	County/PSAP
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SNDGCA16CT9	San Diego Co. Sheriff
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Selective Router	County/PSAP
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STTLWA0657T	King County
overflow to	
STTLWA051ED	

STTLWA0657T	Pierce County
overflow to	
STTLWA051ED	

STTLWA0657T	Thurston County
overflow to	
STTLWA051ED	

STTLWA0657T	Lewis County
overflow to	
STTLWA051ED	

STTLWA0657T	Kitsap County
overflow to	
STTLWA051ED	

STTLWA0657T	Mason County
overflow to	
STTLWA051ED	

=NSBP

Snohomish County	GTE-EVRTWAXA3ED
SNOPAC	240-049-001
ESN=500	

GTE-BOTHWAXB1ED
240-049-002

Snohomish County	GTE-EVRTWAXA3ED
Marysville PD	240-049-001
ESN=514	

GTE-BOTHWAXB1ED
240-049-002

Snohomish County	GTE-EVRTWAXA3ED
SNOPAC	240-049-001
ESN=500	

GTE-BOTHWAXB1ED
240-049-002

Snohomish County	GTE-EVRTWAXA3ED
SNOCOM	240-049-001
ESN=510	

GTE-BOTHWAXB1ED

Selective Router	County/PSAP
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GTE-EVRTWAXA3ED	Snohomish County
Overflows to	
GTE-BOTHWAXB1ED	

Selective Router	County/PSAP
STLSMO26DSA	St. Louis County
STLSMO26DSA	Jefferson County
STLSMO26DSA	St. Charles County

Selective Router	County/PSAP
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UNVRFLXA3ED	Pinnellas Co. ECC
overflow to	
TAMPFLXA2ED	

UNVRFLXA3ED	Pasco Co. ECC
overflow to	
TAMPFLXA2ED	

UNVRFLXA3ED	Hillsborough Co.
overflow to	Sheriff's Office
TAMPFLXA2ED	

UNVRFLXA3ED	Sarasota Co. 911 Ctr.
overflow to	
TAMPFLXA2ED	

Selective Router	County/PSAP
WASHDCSW1ED	Washington DC
overflow to	
WASHDCAC1ED	
FRFXVAFF1ED	Fairfax County
overflow to	
ALXNVAAX1ED	
HYVLMDDHY1ED	Charles County
overflow to	
RKVLMDRV1ED	
RKVLMDRV1ED	Montgomery County
overflow to	
HYVLMDDHY1ED	
RKVLMDRV1ED	Prince George's County
overflow to	
HYVLMDDHY1ED	